

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.  
★ APR 07 2011 ★

EAG:EMN  
F.#2008R01634

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**BROOKLYN OFFICE**

- - - - -X

UNITED STATES OF AMERICA

A P P L I C A T I O N

- against -

Crim. No. 11-005 (SLT)

BARTOLOMEO VERNACE, et al.,

Defendants.

- - - - -X

LORETTA E. LYNCH, United States Attorney for the  
Eastern District of New York, by Assistant United States Attorney  
Evan M. Norris, being duly sworn, states as follows:

1. The government hereby applies for an order  
authorizing the unsealing of the affidavit filed on January 10,  
2011 before the Honorable Marilyn D. Go, United States Magistrate  
Judge, Eastern District of New York, in In the Matter of the  
Application for a Search Warrant for: The Commercial Premises  
Known and Described as "Cafe Euro," Located on the First Floor of  
69-44 Cooper Avenue, Queens, New York and the Person of Giancarlo  
Terzo, Mag. Docket No. 11-026 (MDG) (the "Search Warrant  
Affidavit"), for the limited purpose of permitting the government  
to comply with its disclosure obligations in the above-captioned  
case, and to assist the United States Attorney's Office for the  
Southern District of New York ("USAO-SDNY") in complying with its  
disclosure obligations in United States v. Joseph Corozzo, et  
al., Crim. Docket No. 11-012 (RMB) (S.D.N.Y.) ("Corozzo").

2. During the course of the search, which was executed on January 17, 2011, evidence was seized from Bartolomeo Vernace, a defendant in the above-captioned case, and from Vernace and three other defendants in Corozzo, among others.

3. In order to comply with the government's disclosure obligations in the above-captioned case, and to assist USAO-SDNY in complying with its disclosure obligations in Corozzo, the government seeks authorization to unseal the Search Warrant Affidavit and furnish copies to defense counsel in the above-captioned case and in Corozzo.

WHEREFORE, the government respectfully requests that the Court issue an order granting this application.

Dated: Brooklyn, New York  
March 31, 2011

\_\_\_\_\_/s/  
Evan M. Norris  
Assistant U.S. Attorney  
Eastern District of New York